



FCC MAIL ROOM

October 29, 1996

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Federal Communications Commission
Office of the Secretary, Room 222
1919 M Street, NW
Washington, DC 20554

RECEIVED

Re:CC Docket 92-77

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Gentlemen,

Following are the comments of Omniphone, Inc. in the Matter of Billed Party Preference for InterLATA 0+ Calls, CC Docket 92-77.

In addition to this cover letter, we have included the following:

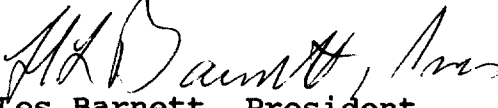
- A brief (one page) summary of our comments
- Our comments (three pages)

Omniphone, Inc. is an Alabama corporation. Omniphone has been in the business of designing and manufacturing "smart technology" for use with public payphones since 1988.

In addition, Omniphone is a major supplier of "smart technology" for use with inmate phones.

Please refer any questions to the writer.

Sincerely,


Les Barnett, President
Omniphone, Inc.

enc.

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Omniphone, Inc.
Brief Summary of Comments, CC Docket 92-77

1. No.
2. We know of various brands of payphone equipment and associated software offering on-demand call rating. There are several U.S. manufacturers of this "Smart Technology", including Omniphone.
3. We do not know of 0+ rate quotes, but believe payphones in the UK quote rates for coin calls.
4. All Omniphone equipment can offer a rate quote. We know of no dissatisfaction with our verbally offering a rate quote. We know of no one forcing the user to hear a rate quote.
5. To comply with TOSCIA, Omniphone consumed less than 100 man hours to add rate quote functionality to its products.
6. We do not have that information.
7. We believe entry of several RBOCs into the market operating as IPPs will serve to establish BOC (local & intraLATA) and AT&T (interLATA & inter-state) rates as a defacto near maximum rate.

1. Are there any industries in which price disclosure to consumers at the point of purchase is not the normal practice? If so, what are those industries and what are particular circumstances surrounding the developments of those industries?

1. Comment. No, not that we can think of.

2. What kinds of technologies(including payphone equipment and associated software) are currently available to provide on-demand call rating information for calls from payphones, other aggregator locations, and phones in correctional institutions that are provided for use by inmates? Commenters should discuss the anticipated declining cost of these technologies, assuming a wide-spread demand for these services.

2. Comment. All "smart technology" manufactured by Omniphone today has the ability to provide on-demand rate quotes to the calling party on all 0+ and 1+ calls. Most equipment manufactured by Omniphone today has the ability to provide on-demand rate quotes to the calling party on all calls, and to the called party as well on collect calls. This includes public payphones and inmate phones.

While we do not propose forcing every caller to hear an unsolicited rate quote on every call, we could easily cause our rate quote feature to engage on every call, requested or not, verses only upon user request. We estimate forty man hours of engineering time to develop this change.

To our knowledge, all (100%) of the coin payphone technologies currently being manufactured in the U.S. that operate on non-coin CO lines (these are commonly referred to collectively as "smart phones" and "smart phone technology") are able to provide on-demand call rating information to the calling party for calls from such payphones. This should be obvious, since these coin payphones must rate the 1+ calls dialed by end users, and request deposits to cover the initial period, and later during the same call, deposits for subsequent periods. Some of these "smart phones" only have "coin" rate tables inside the smart technology. Others have rate tables for coin, calling card, collect, and person to person collect calls residing in the smart technology.

For example, an end user picks up the handset of a coin payphone, and dials an inter-state call 1+ ten digits. The coin payphone is either (1) on a "coin line" class of service from the local exchange carrier, or (2) not on a "coin line" class of service from the local exchange carrier. If the coin payphone is not on a "coin line" (example 2), then some kind of "smart technology" inside the coin payphone or attached to it on the customer premiss will have to request coin deposits equal to the initial period rate, ie; "Please deposit two dollars and ten cents for the first two minutes". Clearly, the smart technology used by that coin payphone could just as easily quote 0+ rates if they do not now.

3. Are there any telecommunications markets outside of the U.S. that already make use of price disclosure prior to call completion, for example, in the U.K.? If so, please provide the technological and financial details behind the implementation of these services and any indication as to the cost and benefits from the perspective of consumers.

3. Comment. We believe that coin payphones in the U.K. quote rates (make use of price disclosure) prior to call completion. We do not know about 0+ calls from such phones.

4. Some commenters have claimed that price disclosure prior to call completion would create an unacceptable delay to consumers. Are there any studies that substantiate or dispute this contention and are those studies available? Are there any studies available that provide indications of consumer satisfaction or dissatisfaction with 0+ services provided in this fashion?

4. Comment. All coin payphones we know of offer/provide rate quotes for all 1+ dialed calls by requesting a deposit before the call is completed. On most payphones a sign offers the user a rate quote for 0+ calls. This seems to address the need to make rate quotes available for end users in cases where the calling party is paying for the call. While some equipment brands experience some delay in providing the rate quote if requested, we have not heard that complaint leveled at Omniphone.

Equipment manufactured by Omniphone can be set to offer a rate quote to the called party on collect calls prior to call completion. When set to operate this way, collect calls are delivered to the called party, and upon answer the called party is prompted as follows; "You have a collect call from (recorded caller's voice). To accept the call, dial zero. To refuse the call, dial 5 or hang up now. For a rate quote, dial seven."

If the called party dials seven, they hear an exact rate quote for that call, as follows; "Two dollars and fifty cents for the first two minutes, twenty five cents for each additional minute", or whatever the actual rate and period is. We know of no customer dissatisfaction with this method. We suggest that the state of Georgia may have some data available, since they require that such rate quotes be offered to the called party on collect calls, and be provided upon request.

5. If some or all of embedded base equipment and software are incapable of providing audible notice to consumers for on-demand call rating, what time period would be reasonable for substituting equipment and software that is capable of doing so?

5. Comment. In 1990, the Telephone Operator Consumer Services Improvement Act required that Operator Service Providers "disclose immediately to the consumer, upon request and at no charge to the consumer-a quote of its rates or charges for the call;..". At Omniphone, we took the "consumer" to mean the calling party call

for coin and calling card calls, and the called party for collect calls. As a result, we developed software that enabled our public payphone "smart technology" to provide accurate rate quotes for the specific call in question, upon request, to the calling party for coin, calling card and collect calls. In addition, this software enabled our public payphone "smart technology" to prompt the called party of a collect call to "dial seven for a rate quote" (in addition to accepting or refusing the call). If the called party then dialed seven, the called party would receive an accurate rate quote for the initial period, followed by a quote for the subsequent period.

We consumed less than one hundred man hours of engineering time to develop this change.

6. What percentage of interstate 0+ calls do calls from correctional institutions constitute, both in quantity and dollar volume, over the last 5 years?

6. Comment. We do not have that information.

7. What effect, if any, will the recent Report and Order in the Matter of Pay telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Policies and Rules Concerning Operator Service access and Pay Telephone Compensation, CC Docket Nos. 96-128,91-35, FCC 96-388(released September 20, 1996) have on this proceeding?

7. Comment. If several of the RBOCs enter the public payphone business on an equal footing with the IPPs, we believe that they will operate at or near existing Telco rates for local and intra-LATA calls, and at or near AT&T rates for inter-LaTA and out of state calls. We conclude from this that the entry of these large players, operating at dominate carrier rates will force price competition to the benefit of the end user.

This, combined with the TOSCIA requirements of OSPs to provide accurate rate quotes upon request, protects the consumer while allowing location owners to enjoy competition. Satisfying the location owner is important in order to maintain widespread availability of public payphones.